

RE: KENNETH S BALDWIN
LINDA M CALLAHAN

) Case No. 19 B 26622
)
Debtors) Chapter 13
)
) Judge: DONALD R CASSLING

NOTICE OF MOTION

KENNETH S BALDWIN
LINDA M CALLAHAN
230 D 11TH ST
WHEELING, IL 60090

CUTLER & ASSOC
via Clerk's ECF noticing procedures

Please take notice that on December 19, 2019 at 10:00 am my designee or I will appear before the Honorable Judge DONALD R CASSLING at 219 South Dearborn Courtroom 619, Chicago, IL and present the motion set forth below.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail at 55 E Monroe St., Chicago, IL 60603 or by the methods indicated on November 22, 2019.

/s/ Tom Vaughn

TRUSTEE'S MOTION TO DISMISS FOR UNREASONABLE DELAY

Now comes Tom Vaughn, Trustee in the above entitled case and moves the Court to dismiss this case in support thereof states:

1. On September 19, 2019 the Debtors filed a petition and plan under Chapter 13 of Title 11 U.S.C.
2. That the above-captioned plan has not yet been confirmed.
3. That the Debtors has caused unreasonable delay that is prejudicial to creditors by failing to:

Amend schedule I - part time Mrs. Wheeling Chamber of Commerce \$400 week and Lyft \$200 week; amend schedule H - Mr. cosigned for sons financial aid; amend statement of financial affairs - #4/#5 - blank; #27 - show prior Mrs. business information and amend plan - not feasible.

WHEREFORE, the Trustee prays that this case be dismissed for unreasonable delay by the debtor pursuant to 11 U.S.C. § 1307 (c) (1).

Respectfully submitted,
/s/ Tom Vaughn

TOM VAUGHN
CHAPTER 13 TRUSTEE
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